

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In Re:

JOSEPH R. RICE  
LORRAINE D. RICE,

Case No. 20-41841  
Chapter 13  
Judge RANDON

Debtors.

**DEBTORS' PROPOSED PLAN MODIFICATION**

NOW COMES the Debtors, **JOSEPH R. RICE AND LORRAINE D. RICE**, by and through their undersigned counsel, and in support of this proposed plan modification state as follows:

1. Debtors filed for Chapter 13 bankruptcy protection on **February 10, 2020**.
2. Debtors' Chapter 13 plan was confirmed by order of this court on **May 19, 2020**.
3. Debtors request the following modification to their Chapter 13 plan:
  - a. **That the Debtor's plan payment shall decrease to \$0 weekly effective July 29, 2022;**
  - b. **That Debtor's plan payments shall increase to \$196.00 weekly effective October 1, 2022;**
4. This proposed modification is necessary due the following factors:
  - a. Debtors have a judgment of possession against them and must move out of their house in the very near future;
  - b. Debtor wife broke her leg and is in a non-weight bearing cast and must use a wheelchair;
  - c. Debtor husband has been off work on unpaid FMLA for the past couple of weeks and expects to remain off work for another week;
  - d. The Debtors need to pay someone to move them as Debtor wife will not be able to walk for at least two more months.
  - e. The Debtors need to save for a security deposit and moving expenses and cannot afford their plan payment while they have no income or for the immediate

future while they are paying moving expenses.

5. Per this plan modification, the general unsecured creditors will receive at least the amount they are entitled to receive pursuant to the Debtor's liquidation analysis.
6. This proposed modification is necessary because the Debtors' circumstances have changed since the plan was confirmed.
7. The proposed modification has the following impact on the classes of creditors being paid by the Trustee as follows:
  - a. Class 1 creditors shall be unaffected by this proposed modification.
  - b. Class 2 creditors shall be unaffected by this proposed modification.
  - c. Class 3 creditors shall be unaffected as there are no such claims in Debtor's plan.
  - d. Class 4 creditors shall be unaffected by this proposed modification.
  - e. Class 5 creditors shall be unaffected by this proposed modification.
  - f. Class 6 creditors shall be unaffected as there are no such claims in Debtor's plan.
  - g. Class 7 creditors shall be unaffected as there are no such claims in Debtor's plan.
  - h. Class 8 creditors shall be unaffected as there are no such claims in Debtor's plan.
  - i. Class 9 creditors shall receive at least the amount they are entitled to receive pursuant to the Debtor's liquidation analysis.

WHEREFORE, Debtor respectfully requests this honorable Court to grant this proposed modification.

Respectfully submitted,

Dated: 7/29/2022

**/s/ Heather D. McGivern**

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